

FILED VIA MAIL

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

JUN 22 2015

CLERK U.S. BANKRUPTCY,
ORLANDO DIVISION

In re:

DANIEL GOODMAN, JR.

DEBTOR.

DANIEL GOODMAN, JR.

PLAINTIFF/DEBTOR

V.

**THE STATE OF CALIFORNIA ACTING
BY AND THROUGH THE STATE
BOARD OF EQUALIZATION,**

DEFENDANT

§
§ CASE NO. 6:15-bk-01852-CCJ

CHAPTER 7

**ADVERSARY PRO. NO. 6:15-ap-00062-
CCJ**

**EX PARTE MOTION FOR ADMISSION *PRO HAC VICE* AS COUNSEL FOR
DEFENDANT, REQUEST FOR WAIVER OF LOCAL COUNSEL DESIGNATION, AND
REQUEST FOR ECF FILING PRIVILEGES**
(Not objected to by Plaintiff)

TO THE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW State Board of Equalization of the State of California ("SBE"), a constitutional agency of the State of California, by and through its undersigned counsel, pursuant to the Rule 2090-1(c) of the Local Rules of the United States Bankruptcy Court for the Middle District of Florida, Dana Flanagan-McBeth (the "Movant"), Counsel to the California State

Board of Equalization (the “SBE”), and respectfully moves for admission *pro hac vice* to represent the SBE, the defendant in the above-captioned adversary proceeding.

Movant also respectfully requests that the local counsel requirements of Local Rule 2090-1(c) be waived.

Movant also respectfully requests that she be granted ECF filing privileges and be authorized to request and obtain an ECF login name and password.

Plaintiff, through counsel, has authorized the undersigned to state that he does not oppose this motion, as set forth in the email attached hereto. Accordingly, Movant has not employed the negative notice procedure set forth in Local Rule 2002-4.

In support of this motion, Movant states as follows:

1. As set forth in the attached affidavit:

- I am a member in good standing of the bars of the State of California in the United States District Court of the Eastern District of California, the United States District Court for the Central District of California, and the United States District Court of the Southern District of California.
- I am employed as a Tax Counsel III, Specialist by the California State Board of Equalization located at 450 N Street, MIC 82, Sacramento, CA 95814.
- I have never been denied admission or been disciplined by this or any other court;

2. Movant respectfully requests that the Court waive the requirement to designate local counsel. The SBE does not have an office in the Middle District of Florida, nor does it have funds to retain local counsel.

WHEREFORE, Movant respectfully requests that she be admitted *pro hac vice* to represent the SBE in the above-captioned bankruptcy case

Dated: June 18, 2015

Respectfully submitted:



Dana Flanagan-McBeth,
California State Bar No. 208291
State Board of Equalization
Legal Department
450 N Street - MIC:82
Post Office Box 942879
Sacramento, CA 94279-0082
(916) 323-3354 (telephone)
(916) 323-3387 (facsimile)
Email address: Dana.Flanagan-McBeth@boe.ca.gov

COUNSEL FOR THE
STATE BOARD OF EQUALIZATION

-----Original Message-----

From: Nardella, Michael [mailto:mnardella@burr.com]
Sent: Wednesday, June 17, 2015 4:11 PM
To: Flanagan-McBeth, Dana (Legal)
Cc: Geary, Victoria
Subject: RE: In re Goodman Case No. 15-01852

Dana,

Confirmed on the extension and that we do not oppose you seeking a waiver of local counsel.

Michael

Michael Nardella - Attorney at Law
Burr & Forman LLP

Suite 800 - 200 South Orange Avenue - Orlando, Florida 32801
direct 407-540-6620 - fax 407-650-2777 - main 407-540-6600

mnardella@burr.com - www.burr.com
ALABAMA - FLORIDA - GEORGIA - MISSISSIPPI - TENNESSEE

The information contained in this email is intended for the individual or entity above. If you are not the intended recipient, please do not read, copy, use, forward or disclose this communication to others; also, please notify the sender by replying to this message, and then delete this message from your system. Thank you.

-----Original Message-----

From: Flanagan-McBeth, Dana (Legal) [mailto:Dana.Flanagan-McBeth@boe.ca.gov]

Sent: Wednesday, June 17, 2015 6:16 PM

To: Nardella, Michael

Cc: Geary, Victoria

Subject: In re Goodman Case No. 15-01852

Importance: High

This is to confirm our earlier conversation wherein I requested a two week extension to file the responsive pleading from July 1, 2015, to July 15, 2015, and also to not oppose our waiver of the requirement to associate with local counsel in Orlando, Florida. You advised that you would confer with Mr. Goodman and then respond to our request via e-mail. Thank you.

Dana Flanagan-McBeth
Tax Counsel III, Specialist
Legal Department, Litigation Division
Bankruptcy and Collections Section
(916) 323-3354 (desk)
(916) 769-3352 (cell)
Dana.Flanagan-McBeth@boe.ca.gov

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**AFFIDAVIT OF DANA FLANGAN-MCBETH IN SUPPORT OF
THE MOTION FOR ADMISSION *PRO HAC VICE***

TO THE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Dana Flanagan-McBeth, who after being duly sworn, deposes and says on oath
and under penalty of perjury:

1. I am an attorney at law with the California State Board of Equalization, having an office at 450 N Street, MIC 82, Sacramento, CA 95814. My telephone number is (916) 323-3354. My e-mail address is Dana.Flanagan-McBeth@boe.ca.gov.
2. I have been admitted to practice before the following court on the following dates:

Central District of California	March 30, 2010
Eastern District Court of California	December 13, 2000
Southern District of California	April 14, 2010
District Court of Colorado	October 11, 2011

3. I am in good standing and eligible to practice in all of the foregoing courts.
4. I am not now, nor have I ever been, the subject of any disciplinary matters;
5. I have been previously admitted to appear *pro hac vice* in the Middle District of

Florida.

6. I have never been previously admitted to appear *pro hac vice* in the Middle District of Florida.

7. I am familiar with the requirements of the District Court Local Rules 2.01 and 2.02 and Bankruptcy Court Local Rule 2090-1.

8. I am familiar with the substantive and the procedural requirements of the Local Rules and administrative orders of the Bankruptcy Court, including the ECF filing requirements, and understand that as an attorney appearing specially I am subject to the same disciplinary process as member of the bar of the District Court.

Dated: June 19, 2015

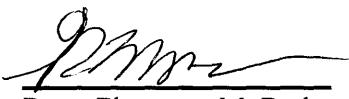


Dana Flanagan-McBeth

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of June 2015, I caused to be served a true and accurate copy of the Ex-Parte Motion for Admission Pro Hac Vice and Request for Waiver of Local Counsel Designation together with the affidavit in support thereof via United States mail, postage prepaid, on the individual listed below, and via electronic means on the parties receiving notice through the court's ECF noticing system on this 19th day of June 2015, upon the following parties:

Michael Nardella - Attorney at Law
Burr & Forman LLP
Suite 800 - 200 South Orange Avenue
Orlando, Florida 32801



Dana Flanagan-McBeth